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Attorneys for EDWIN G. MARSHALL and  
 DR. JILL C. MARSHALL, Petitioning Creditors

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF NEVADA

RENO DIVISION

In re:	Case No. 18-50412
MEDIZONE INTERNATIONAL, INC.,	Chapter 11
Debtor.	

**STIPULATION REGARDING DISMISSAL OF INVOLUNTARY CHAPTER 11 PETITION**

Pursuant to the provisions of 11 U.S.C. § 303(j), the petitioning creditors herein, EDWIN G. MARSHALL and DR. JILL C. MARSHALL (collectively, the “Marshalls”); USHIO AMERICA, INC.; and ENGINEERING CPR, INC., on the one hand, and LENARD SCHWARTZER, as trustee (the “Trustee”) of the chapter 7 estate of MEDIZONE INTERNATIONAL, INC., Case No. 18-12662 (the “Chapter 7 Case”), now pending in the Las Vegas Division of the above-captioned Court (the “Las Vegas Court”), on the other hand; and by the terms of Paragraph 25 of the *Loan Agreement* dated May 17, 2018, entered into by and between the Marshalls and the Trustee, as approved by the Las Vegas Court by the terms of an order entered on a final basis on June 15, 2018 in the Chapter 7 Case,

NOW, THEREFORE, the parties hereby stipulate and agree as follows:

1. Upon an order of the Bankruptcy Court, the involuntary petition (the “Chapter 11

Petition”) filed in the above-captioned case shall be dismissed without prejudice.

2. Nothing herein or by virtue of the dismissal of the Chapter 11 Petition shall prejudice or impair any of the petitioning creditors’ right to seek reimbursement of fees and expenses incurred in filing, prosecuting or otherwise acting with respect to the Chapter 11 Petition, pursuant to § 503(b) of the Bankruptcy Code.

3. Nothing herein or by virtue of the dismissal of the Chapter 11 Petition shall prejudice or impair any of the petitioning creditors’ right to seek conversion of the Chapter 7 Case to a case under chapter 11 of the Bankruptcy Code, pursuant to Section 706(b) of the Bankruptcy Code.

DATED: June 29, 2018

MEYERS LAW GROUP, P.C.

By: /s/ Merle C. Meyers  
Merle C. Meyers, Esq.  
Attorneys for Edwin G. Marshall and  
Dr. Jill C. Marshall, Creditors

DATED: June 29, 2018

USHIO AMERICA, INC.

By: /s/ Holger Claus  
Holger Claus  
Vice President

DATED: June 29, 2018

ENGINEERING CPR, INC.

By: /s/ Taras Worona  
Taras Worona  
Chief Executive Officer

DATED: June 29, 2018

SCHWARTZER & MCPHERSON LAW FIRM

By: Jason A. Imes  
Jason A. Imes, Esq.  
Attorneys for Lenard Schwartzer,  
Trustee of the chapter 7 estate of Medizone  
International, Inc., Debtor